

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHNNY M. HUNT, )  
                        )  
Plaintiff,           )  
                        )  
vs.                   )      Case No. 3:23-cv-00243  
                        )  
SOUTHERN BAPTIST CONVENTION; )      Judge Campbell  
GUIDEPOST SOLUTIONS LLC; and )      Magistrate Judge Frensley  
EXECUTIVE COMMITTEE OF THE )      Jury Demand  
SOUTHERN BAPTIST CONVENTION, )  
                        )  
Defendants.          )

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**MOTION FOR LEAVE TO FILE UNDER SEAL**

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Pursuant to Rules 5.03 and 7.01 of the Local Rules of Court and the Second Amended Agreed Protective Order previously entered in this action (ECF Doc. No. 153), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal the unredacted version of the Memorandum in Support of Motion to Reconsider Order No. 158 Regarding Text Messages, as well as certain exhibits thereto, submitted by Plaintiff on April 8, 2024 (ECF Doc. No. 163) until such time as the Court adjudicates the issues.

Portions of the Memorandum in Support of Motion to Reconsider Order No. 158 Regarding Text Messages contain references to information that has been designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Second Amended Agreed Protective Order, which has also resulted in the public filing of the Memorandum in Support of Motion to Reconsider Order No. 158 Regarding Text Messages in redacted form pursuant to Local Rule 5.03(c).

Without conceding the propriety or the merits of the “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” designations by Guidepost, Plaintiff files the instant motion in an effort to ensure compliance with the Local Rules of the Court and the Second Amended Agreed Protective Order.

For the foregoing reasons, and without conceding the merits of the “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” designations by Guidepost, this Court should review the unredacted version of the Memorandum in Support of Motion to Reconsider Order No. 158 Regarding Text Messages and exhibits under seal.

[SIGNATURE BLOCKS AND CERTIFICATE OF SERVICE TO FOLLOW]

Dated: April 8, 2024

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on April 8, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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